

## **Lesher, Mark**

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**From:** Catlin, Kelley  
**Sent:** Tuesday, April 10, 2018 3:51 PM  
**To:** Lesher, Mark  
**Subject:** FW: EST Inc. Revised Proposal  
**Attachments:** ESTInc\_labeluse.xlsx

FYI

Kelley Catlin  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 7  
11201 Renner Boulevard  
Lenexa, KS 66219

Phone: (913)551-7110  
[catlin.kelley@epa.gov](mailto:catlin.kelley@epa.gov)

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**From:** Catlin, Kelley  
**Sent:** Tuesday, April 10, 2018 3:51 PM  
**To:** 'Madhu Mandava' <Madhu@mandava.com>; EST Inc <est@estchemicals.com>; Michael J. Fischer <mfischer@paynejones.com>  
**Cc:** Jay Spence <jspence@Ensafe.com>  
**Subject:** RE: EST Inc. Revised Proposal

Gentlemen,

It has just come to my attention that the EST webpage includes the EPA Logo for the "Design for the Environment - Green Certified Products" Program, but EST is not a partner. EPA considers this misuse of the Design for the Environment label and it must be removed from the webpage. Attached is a summary of instances on the website where the Design for the Environment label or "EPA compliant" claim can be found. All references to this program must be removed until EST becomes an official partner.

I will be including an additional term in the CAFO that these references must be removed from the webpage.

Please let me know if you have any questions.

Thank you, Kelley

Kelley Catlin  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 7  
11201 Renner Boulevard

Lenexa, KS 66219

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**From:** Madhu Mandava [<mailto:Madhu@mandava.com>]  
**Sent:** Thursday, April 05, 2018 5:15 PM  
**To:** Catlin, Kelley <[Catlin.Kelley@epa.gov](mailto:Catlin.Kelley@epa.gov)>; EST Inc <[est@estchemicals.com](mailto:est@estchemicals.com)>; Michael J. Fischer <[mfischer@paynejones.com](mailto:mfischer@paynejones.com)>  
**Cc:** Jay Spence <[jspence@Ensafes.com](mailto:jspence@Ensafes.com)>  
**Subject:** RE: EST Inc. Revised Proposal

Kelly,

Thank you for the response. Please forward the CAFO when completed to my attention for review.

Thank you for your kind assistance in this matter.

Best Regards,

Madhu Mandava  
Vice-President  
Mandava Associates, LLC  
4975 Preston Park Boulevard  
Suite 785W  
Plano, TX 75093  
469-331-8390  
[www.mandava.com](http://www.mandava.com)

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\*\*\*\*\*  
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**From:** Catlin, Kelley [<mailto:Catlin.Kelley@epa.gov>]  
**Sent:** Thursday, April 05, 2018 9:53 AM  
**To:** Madhu Mandava; EST Inc; Michael J. Fischer  
**Subject:** FW: EST Inc. Revised Proposal

Sirs,

Thank you for your timely submission. Mark and I have reviewed it, and are finalizing the Consent Agreement and Final Order. This document must be reviewed and approved by our management before we can transmit it to you for signature. I hope to have it to you by next week.

In the meantime, let me know if you have any questions. I would again suggest that you wait until the CAFO is filed to move forward on the SEP.

Kelley

Kelley Catlin  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 7  
11201 Renner Boulevard  
Lenexa, KS 66219

Phone: (913)551-7110  
[catlin.kelley@epa.gov](mailto:catlin.kelley@epa.gov)

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**From:** Madhu Mandava [<mailto:Madhu@mandava.com>]  
**Sent:** Wednesday, April 04, 2018 5:56 PM  
**To:** Catlin, Kelley <[Catlin.Kelley@epa.gov](mailto:Catlin.Kelley@epa.gov)>  
**Cc:** EST Inc <[est@estchemicals.com](mailto:est@estchemicals.com)>  
**Subject:** RE: EST Inc. Revised Proposal

Dear Ms. Catlin,

We are providing the following attached responses in regards to our discussions on the March 30, 2018 conference call. I will have Mr. Patel at EST signed the revised proposal which includes the addendum to the SEP.

Please contact me if you have any questions or require clarifications.

Best Regards,

Madhu Mandava  
Vice-President  
Mandava Associates, LLC  
4975 Preston Park Boulevard  
Suite 785W  
Plano, TX 75093  
469-331-8390  
[www.mandava.com](http://www.mandava.com)

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**From:** Catlin, Kelley [<mailto:Catlin.Kelley@epa.gov>]

**Sent:** Thursday, March 29, 2018 4:09 PM

**To:** Michael J. Fischer; Madhu Mandava

**Cc:** EST Inc

**Subject:** RE: EST Inc. Revised Proposal

Mr. Mandava,

Thank you for your voicemail message. Mark Leshner and I are available for a call tomorrow at 10:30. We have reserved the following conference line: 913-551-8606 – code 100200.

Let me know if that time doesn't work for you.

Thank you, Kelley

Kelley Catlin  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 7  
11201 Renner Boulevard  
Lenexa, KS 66219

Phone: (913)551-7110  
[catlin.kelley@epa.gov](mailto:catlin.kelley@epa.gov)

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**From:** Catlin, Kelley

**Sent:** Thursday, March 29, 2018 11:37 AM

**To:** 'Michael J. Fischer' <[mfischer@paynejones.com](mailto:mfischer@paynejones.com)>; Madhu Mandava <[Madhu@mandava.com](mailto:Madhu@mandava.com)>

**Cc:** EST Inc <[est@estchemicals.com](mailto:est@estchemicals.com)>

**Subject:** RE: EST Inc. Revised Proposal

Good Morning,

Mark Leshner and I have had an opportunity to review the SEP proposal and we have had an opportunity to discuss the proposal with our management. There are a few issues that we need to discuss in order to ensure the project meets the requirements of the SEP policy. In particular, please review the requirements set forth on page 15 of the [SEP policy](#). In order to approve the project we will need a commitment that the requirements described under item 3 on page 15 will be met. Mr. Leshner and I are also prepared to discuss the penalty and SEP mitigation. Please note that most SEPs are not approved at a dollar for dollar ratio.

We are available for a call Monday, April 2 from 1:00-4:00 and Wednesday afternoon from 1:00-2:30. I would envision this call to last no longer than an hour.

Please let me know if you have a preference during the time frames set forth above.

I look forward to working with you to resolve this matter.

Kelley

Kelley Catlin  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 7  
11201 Renner Boulevard  
Lenexa, KS 66219

Phone: (913)551-7110  
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**From:** Michael J. Fischer [<mailto:mfischer@paynejones.com>]  
**Sent:** Thursday, March 22, 2018 2:18 PM  
**To:** Catlin, Kelley <[Catlin.Kelley@epa.gov](mailto:Catlin.Kelley@epa.gov)>; Madhu Mandava <[Madhu@mandava.com](mailto:Madhu@mandava.com)>  
**Cc:** EST Inc <[est@estchemicals.com](mailto:est@estchemicals.com)>  
**Subject:** RE: EST Inc. Revised Proposal

Kelley,

My client was travelling yesterday, so we were able to visit today, and yes, you can certainly speak directly with Mandava Associates. If you would just copy me on correspondence to keep me in the loop, that would be great.

Looking forward to having this resolved for everyone's sake. Call or email any time.

--Mike

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**From:** Catlin, Kelley [<mailto:Catlin.Kelley@epa.gov>]  
**Sent:** Thursday, March 22, 2018 10:36 AM  
**To:** Madhu Mandava; Michael J. Fischer  
**Cc:** EST Inc  
**Subject:** RE: EST Inc. Revised Proposal

Mr. Fischer,

This is a follow up to the voicemail message I just left you. Please respond to the request below, in writing, today or tomorrow.

Thank you, Kelley



Kelley Catlin  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 7  
11201 Renner Boulevard  
Lenexa, KS 66219

Phone: (913)551-7110  
[catlin.kelley@epa.gov](mailto:catlin.kelley@epa.gov)

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**From:** Madhu Mandava [<mailto:Madhu@mandava.com>]  
**Sent:** Wednesday, March 21, 2018 12:27 PM  
**To:** Catlin, Kelley <[Catlin.Kelley@epa.gov](mailto:Catlin.Kelley@epa.gov)>; Michael J. Fischer <[mfischer@paynejones.com](mailto:mfischer@paynejones.com)>  
**Cc:** EST Inc <[est@estchemicals.com](mailto:est@estchemicals.com)>  
**Subject:** RE: EST Inc. Revised Proposal

Dear Michael,

Per Kelley Catlin request, please authorize Mandava Associates, LLC to communicate directly regarding this matter with us as per EST request.

Thank you,

Madhu Mandava  
Vice President  
Mandava Associates, LLC  
4975 Preston Park Blvd.  
Suite 785W  
Plano, TX 75093  
Tel: 469-331-8360  
Fax: (202) 223-0141  
[www.mandava.com](http://www.mandava.com)

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**From:** Catlin, Kelley [<mailto:Catlin.Kelley@epa.gov>]  
**Sent:** Wednesday, March 21, 2018 12:22 PM  
**To:** Michael J. Fischer; Madhu Mandava  
**Subject:** FW: EST Inc. Revised Proposal

Dear Mr. Mandava and Mr. Fischer,

I am requesting some clarification. I received and reviewed the message below. Since EST is represented by legal counsel, I am ethically required to request, in writing, from Mr. Fischer that I have permission to communicate directly with EST and/or Mr. Mandava. It was my understanding that Mr. Fischer was still representing EST as recently as March 19, 2018.

Please advise, in writing, as soon as possible.

Thank you,  
Kelley

Kelley Catlin  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 7  
11201 Renner Boulevard  
Lenexa, KS 66219

Phone: (913)551-7110  
[catlin.kelley@epa.gov](mailto:catlin.kelley@epa.gov)

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**From:** Madhu Mandava [<mailto:Madhu@mandava.com>]  
**Sent:** Wednesday, March 21, 2018 12:06 PM  
**To:** Catlin, Kelley <[Catlin.Kelley@epa.gov](mailto:Catlin.Kelley@epa.gov)>  
**Subject:** EST Inc. Revised Proposal

Dear Ms. Catlin,

Please be informed that I represent EST, Inc for the EPA Enforcement and Compliance and Regulatory Matters. I have attached per your request the revised SEP proposal on behalf of EST Inc. We believe that you received the Agent Authorization letter designating Mandava Associates to act on EST behalf.

Please direct all communications to me regarding this matter.

Thank you and Best Regards,

Madhu Mandava  
Vice President  
Mandava Associates, LLC  
4975 Preston Park Blvd.  
Suite 785W  
Plano, TX 75093  
Tel: 469-331-8360  
Fax: (202) 223-0141  
[www.mandava.com](http://www.mandava.com)

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## Leshner, Mark

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**From:** Williams, Bridget  
**Sent:** Tuesday, April 10, 2018 3:16 PM  
**To:** Leshner, Mark  
**Cc:** Catlin, Kelley; Wen, Chen; Rutsch, Linda  
**Subject:** RE: Is Enviro Science Technologies, Inc. (EST Inc.), Olathe, KS. registered in the "Design for the Environment - Green Certified Products" Program?  
**Attachments:** ESTInc\_labeluse.xlsx

Hi Mark,

They are not a partner and are misusing the DfE label. Attached is a summary of instances on their website where they are using the DfE label or claiming "EPA compliant." We would ask them to remove all of these references.

Please let us know if you would like us to also communicate with them.

Bridget

-----  
Bridget Williams, Ph.D.  
Safer Choice Program  
Chemistry, Economics, & Sustainable Strategies Division  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
202.564.8558 | williams.bridget@epa.gov

[www.epa.gov/saferchoice](http://www.epa.gov/saferchoice)

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**From:** Leshner, Mark  
**Sent:** Tuesday, April 10, 2018 3:26 PM  
**To:** Williams, Bridget <Williams.Bridget@epa.gov>  
**Cc:** Catlin, Kelley <Catlin.Kelley@epa.gov>; Wen, Chen <Wen.Chen@epa.gov>; Rutsch, Linda <Rutsch.Linda@epa.gov>  
**Subject:** RE: Is Enviro Science Technologies, Inc. (EST Inc.), Olathe, KS. registered in the "Design for the Environment - Green Certified Products" Program?

Bridget,

Have you found anything on this company? Have they submitted anything to EPA and meet any of the conditions to market their products as "Design for the Environment - Green Certified Products"? I suspect they may not and are just using the EPA logo as a marketing tool. Please let us know asap as we are in negotiations and they are starting a SEP and we want to wrap this case up soon. Thanks!

Mark

Mark K. Leshner, B.S., M.S.  
Environmental Scientist/Entomologist  
EPA Region 7 Bed Bug Contact  
FIFRA R7 DSO & School IPM Coordinator  
Toxics and Pesticides Branch  
Water, Wetlands, and Pesticides Division  
U.S. Environmental Protection Agency, Region 7

11201 Renner Boulevard  
Lenexa, KS 66219  
913-551-7054  
[lesher.mark@epa.gov](mailto:lesher.mark@epa.gov)

---

**From:** Williams, Bridget  
**Sent:** Monday, April 09, 2018 12:43 PM  
**To:** Leshner, Mark <[Leshner.Mark@epa.gov](mailto:Leshner.Mark@epa.gov)>  
**Cc:** Catlin, Kelley <[Catlin.Kelley@epa.gov](mailto:Catlin.Kelley@epa.gov)>; Wen, Chen <[Wen.Chen@epa.gov](mailto:Wen.Chen@epa.gov)>; Rutsch, Linda <[Rutsch.Linda@epa.gov](mailto:Rutsch.Linda@epa.gov)>  
**Subject:** RE: Is Enviro Science Technologies, Inc. (EST Inc.), Olathe, KS. registered in the "Design for the Environment - Green Certified Products" Program?

Hi Mark,

Thank you for bringing this to our attention. We'll look into this right away.

Bridget

---

Bridget Williams, Ph.D.  
Safer Choice Program  
Chemistry, Economics, & Sustainable Strategies Division  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
202.564.8558 | [williams.bridget@epa.gov](mailto:williams.bridget@epa.gov)

[www.epa.gov/saferchoice](http://www.epa.gov/saferchoice)

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**From:** Leshner, Mark  
**Sent:** Monday, April 09, 2018 1:36 PM  
**To:** Williams, Bridget <[Williams.Bridget@epa.gov](mailto:Williams.Bridget@epa.gov)>; Wen, Chen <[Wen.Chen@epa.gov](mailto:Wen.Chen@epa.gov)>  
**Cc:** Catlin, Kelley <[Catlin.Kelley@epa.gov](mailto:Catlin.Kelley@epa.gov)>; Leshner, Mark <[Leshner.Mark@epa.gov](mailto:Leshner.Mark@epa.gov)>  
**Subject:** Is Enviro Science Technologies, Inc. (EST Inc.), Olathe, KS. registered in the "Design for the Environment - Green Certified Products" Program?  
**Importance:** High

Bridget and/or Chen,

R7 is working on a case that involves a company known as Enviro Science Technologies, Inc. (EST Inc.), Olathe, KS and they are placing the EPA Logo for the "Design for the Environment - Green Certified Products" Program on their website. Is there a way to check if they have met all the conditions, submitted data on their products, etc. to be using this logo?

Company Information:

Enviro Science Technologies Inc. (EST Inc.)  
15785 S. Keeler Terrace  
Olathe, KS 66062  
EPA Est. No. 83240-KS-001  
President: Vinay Patel

Any assistance on this issue would be of great help in resolving this case. Thanks!

Mark

Mark K. Leshner, B.S., M.S.  
Environmental Scientist/Entomologist  
EPA Region 7 Bed Bug Contact  
FIFRA R7 DSO & School IPM Coordinator  
Toxics and Pesticides Branch  
Water, Wetlands, and Pesticides Division  
U.S. Environmental Protection Agency, Region 7  
11201 Renner Boulevard  
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913-551-7054  
[lesher.mark@epa.gov](mailto:lesher.mark@epa.gov)



